

## Chen, Isaac

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**From:** Saladen, Michael T [saladen@lanl.gov]  
**Sent:** Monday, May 06, 2013 2:46 PM  
**To:** Chen, Isaac; Trujillo, Erin S, NMENV (erin.trujillo@state.nm.us)  
**Cc:** Saladen, Michael T; Bailey, Marc A; Gallegos, Robert M; Turner, Gene E; Grieggs, Tony  
**Subject:** FW: SWWS Compost Registration Issue

Isaac,

Per your request, summarized below is the current status of sludge composting and land application/reuse at Los Alamos National Laboratory (Laboratory), as it relates to the NPDES Permit issued by EPA and the Groundwater Discharge Plan issued by NMED. We are meeting with NMED on Thursday (May 9, 2013) to discuss the strategy for a path forward and will keep you informed.

On August 1, 2012 DOE/LANS submitted a Registration Package and Notice of Intent to Discharge (NOI) to NMED for the TA-46 SWWS Composting Facility. In their December 21, 2012 response, NMED's Groundwater Quality Bureau (NMED-GWQB) indicated a discharge permit was not required for the SWWS Compost Facility operations. They did, however, question the proposed method of land application of compost at Sigma Mesa and requested additional information on agronomic loading (nitrogen) before they would make a final decision on the need for a discharge permit. Additionally, on August 15, 2012 the Laboratory submitted to EPA a Notice of Planned Change regarding this potential change in sludge management practice.

NMED's Surface Water Quality Bureau (NMED-SWQB) requested management and total retention of the compost so that it does not reach water courses. The Sigma Mesa Site at TA-60 was selected because the site's storm water discharges are controlled under the provisions of the MSGP.

The NMED-GWQB anticipates compost to be used in a more typical fashion. This could mean across the Laboratory for landscaping and other beneficial uses.

The NMED-Solid Waste Bureau will not issue the Registration until the GWQB NOI and SWQB issues are resolved.

It is our intent to reframe the Registration and NOI and propose to use compost in a more traditional manner, i.e., land apply for beneficial use throughout the Laboratory. We have spoken individually with NMED staff and it is now time to get together and discuss the path forward.

Focus areas:

1. Expansion of compost land application sites across the Laboratory.
  - TA-03 (79+ acres)
  - TA-16 (12 acres)
  - TA-60 Sigma Mesa (2.5 acres)
  - Post construction reclamation sites (TA-50)
2. Application of compost will occur under controlled conditions that include application rates, management and retention.
  - Construction Sites with Construction General Permit Controls
  - LANL Institutional Controls – PRID and EXID
  - Sites with Multi-Sector General Permit (MSGP) controls
  - Compost application rate 30 Mg ha<sup>-1</sup> (Compost application rates in semi-arid grassland soils)
  - Nitrogen application rate of 40 to 180lbs of N per year (per NMSU Forest Ecologist)

### 3. Rates of reapplication of compost

- 5-10 year intervals
- One time application (reclamation sites).

If a path forward is selected/approved, the Laboratory will submit a clarification letter (i.e. follow up to the August 15, 2012 Notice of Planned Change) to document the selected path forward. Please call if you have questions or need more information. Thanks!!!

Mike